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#### ATTACHMENT I

#### INSPECTION STAFF PROGRAM -- 1 AUGUST 1976 - 1 DECEMBER 1976

- 1. Executive Order 11905 of February 19, 1976, in presenting the functions of the Inspector General, instructs the IG to "formulate practices and procedures designed to discover and report to the (Executive) Oversight Board activities that raise questions of legality or propriety". (Sec. 6(b)(5))
- 2. Headquarters Notice of 19 April 1976 states: "The IG periodically will review all components within Headquarters, throughout the United States and overseas".

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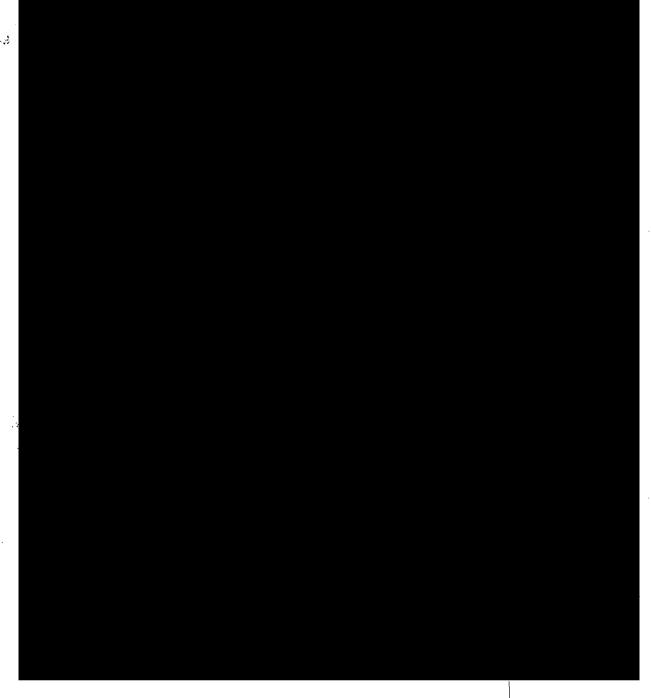
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- 3. Headquarters Regulation HR states: "The Chief Inspection Staff will (a) conduct periodic inspections of all CIA offices for compliance with CIA authorities and regulations...".
- 4. SSC Recommendation 62 states: "The program of component inspections conducted by the Inspector General should be increased, as should the program surveys of sensitive programs and issues which cut across component lines in the Agency".
- 5. The Rockefeller Commission Report, Recommendation 9c states: "The Inspector General's duties with respect to domestic CIA activities should include periodic reviews of all offices within the U.S. He should examine each office for compliance with CIA authority and regulations as well as for the effectiveness of programs in implementing policy objectives".
- 6. While no specific cycle time for component inspections is stipulated in either the Executive Order or CIA regulations and notices, the thrust of the above would suggest that we would be well advised to be in a position to report authoritatively to the Executive Oversight Board and the Senate Oversight Committee at an early date that CIA is in compliance with its own regulations and the spirit as well as letter of the Executive Order. The spirit and intent of the above would suggest that a reasonably quick component inspection is desirable.
- 7. With this in mind, the following component inspections and special studies have been completed, are under way and will soon be completed, or are planned.
- 8. The 40 members of the Audit Staff who keep to a rigorous schedule of domestic and overseas audits are indoctrinated in HR and represent a peripatetic body of officers to further

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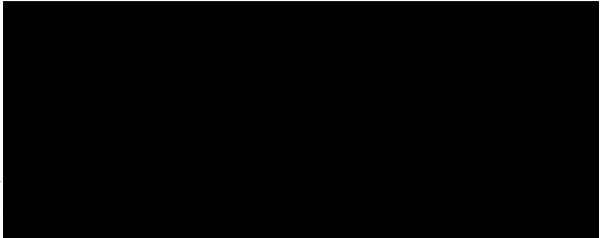
contribute to the IG's ability to spot violations of HR well as violations of accounting/fiscal regulations.





The purpose of the Phase I component inspections per above is (a) to be able by 1 November 1976 authoritatively to report the status of CIA in relation to Executive Order 11905 and Headquarters Regulation \_\_\_\_\_, and to gain adequate insights into the components to permit the selection and assignment of priority to those sub-components which warrant the more traditional, intensive inspections. These Phase I inspections will not review sub-components already inspected or about to be inspected per A and B above.

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### INSPECTOR LIAISON OFFICERS WITH AUDIT STAFF:



The purpose of this category is to bring the Inspection Staff and Audit Staff closer together and to avoid duplication of These officers will participate in some expanded audits to provide greater breadth of approach (See Attachment 2 for description of Audit Staff's role and relationship with the Inspection Staff). From time to time auditors will be included in inspection teams.

## F. COMPLAINT STAFF:

A change in procedure hereby establishes a staff of inspectors, listed below, which will specialize in hearing and resolving complaints and interviewing returnees from overseas. Heretofore project inspectors have handled complaints on a part-time, ad hoc basis.

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It should be noted that interviews with returnees from the field and complainants are also useful in finding evidences of violations of Executive Order 11905 and Source. (See Attachment 3 for a list of on board inspectors.)

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# CONFIDENTIAL ATTACHMENT 2

# The Audit Function and the Scope of Audits in CIA; Relationship to Inspections

1. Some knowledge of the legal and administrative basis of the Federal Government's standards and procedures for internal auditing in Federal agencies is important to an understanding of the audit function and the scope of audit in CIA and CIA's regulation on the subject. CIA regulation HR (see attached) observes these standards, while at the same time taking into account the Agency's unique circumstances in terms of its operations and use of confidential funds.

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- 2. The Budget and Accounting Procedures Act of 1950 requires the head of each executive agency to conduct internal audits in accordance with standards established by the General Accouting Office, the auditing arm of Congress. These standards provided for expanded audits. Until recently, however, the Agency generally limited the Audit Staff to the performance of financial/compliance audits. The Agency's philosophy was to emphasize strong financial audits because of its unique responsibility for the expenditure of confidential funds. Agency management believed that disclosure of financial irregularities could jeopardize the continuance of confidential funds authority.
- 3. Since 1950, GAO has promulgated audit standards which extend beyond the traditional financial/compliance audit. Recently GAO and OMB, the management arm of the Executive Branch, have stressed the need for increasing the scope of audit coverage in Federal agencies, including CIA. Their guidelines are contained in GAO's Standards for Audit of Governmental Organizations, Programs, Activities and Functions and OMB's Federal Management Circular 73-2. CIA regulation which is consistent with the provisions of these issuances, specifies the standards of expanded audits as conducted in CIA. These standards provide for a scope of audit that includes not only financial compliance auditing but also auditing for "economy and efficiency," and "achievement of desired results"; these latter are known as expanded audits. The concept of accountability is woven into the basic premises supporting the standards.

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4. These various authoritative issuances have been instrumental in the writing of and will become more important if there is a resumption in any form of GAO external audits of CIA. GAO relies on the work of the internal auditors and the other evaluation/assessment elements in a Federal agency and to the extent that GAO can accept this work, it limits its own reviews.

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- 5. The work related to financial/compliance auditing is well known and includes an examination of financial transactions, accounts, and reports including an evaluation of compliance with applicable laws and regulations. This is the first element of the three elements which constitute a full scope audit.
  - 6. In making a determination as to whether Agency resources are managed economically and efficiently (the second element of a full scope audit) the auditor, should be alert to such examples of uneconomical practices or inefficiencies as:
    - (a) Procedures which are ineffective or more costly than justifiable.
    - (b) Redundancy of effort by employees or between organizational units
    - (c) Performance of work which serves little or no useful purpose
    - (d) Inefficient or uneconomical use of equipment; faulty buying practices
    - (e) Overstaffing in relation to work to be done
    - (f) Wasteful use of resources
- 7. The third element of a full scope audit consists of a review of a program or activity to determine whether the desired results and benefits are being achieved and whether the program or activity is meeting established objectives. The auditor, should consider:
  - (a) The relevance and validity of the criteria used by the audited entity to judge effectiveness in achieving program results
  - (b) The appropriateness of the methods followed by the entity to evaluate effectiveness in achieving program results
  - (c) The accuracy of the data accumulated
  - (d) The reliability of the results obtained

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In other words, the auditor will not necessarily accumulate data himself to determine whether programs are meeting established objectives, but will normally only review and test those procedures and methods employed by line management to evaluate programs and activities. This could also include evaluation and review of MBO and other Agency management systems. It should be noted that the audit standards promulgated and adopted by OMB and GAO permit the auditor to accept the work of other assessment and evaluation groups.

- 8. Under the Audit Staff is required to coordinate the selection of subject matter for an expanded audit with the Deputy Director concerned. Since only the DCI can exempt a program or component from audit (and none are presently exempt), a Deputy Director who wishes such an exemption would have to seek DCI approval if the Deputy Director objected to an audit. The Audit Staff's limited resources and commitment to financial/compliance audits preclude more than a few expanded audits at this time. Resources are limited particularly in terms of the number of auditors believed to have the necessary experience and background to conduct expanded audits.
- 9. During a routine financial compliance audit, the auditors may uncover uneconomical practices and inefficiencies, or they may also discern that desired results are not being achieved. In these cases, the auditors would not be fulfilling their responsibilities if they did not explore these matters further and comment on their findings.
- 10. There is an area of potential overlap between the Audit Staff and the Inspection Staff. The Inspector General has the responsibility to conduct periodic inspections of all CIA offices to determine the effectiveness of their programs in implementing policy objectives. This authority is broadly encompassing. Audit Staff's authority to determine whether programs are meeting established objectives and desired results are being achieved is oriented primarily toward testing and reviewing procedures and methods used by line managers to evaluate use of their resources. There is the possibility of some overlap here, but since the Inspector General monitors the work of both the Inspection and Audit Staffs, he views as one of his major tasks the limitation of unnecessary duplication between expanded audits and inspections.
- 11. Serious efforts will be made to avoid duplication of audit and inspection effort, and to make more effective use of the limited number of qualified personnel available to conduct these kinds of inspections and audits.

  states under 1b(2)(c) that the Chief, Audit Staff will:

When an audit is planned which encompasses elements of (extended audits) augment the audit team where necessary with an individual or individuals with appropriate experience in the technical field or operational area to be reviewed. These individuals may be drawn from either the Inspection Staff, the directorate involved, retirees, or outside consultants, and should be independent of the program under review. Individuals selected for augmentation of audit teams will be appropriately cleared with the Deputy Director concerned.

This technique has seldom been utilized in the past when an expanded audit was undertaken. If a Deputy Director believes that an expanded audit would benefit from the assistance of technical expert(s), he should so recommend to the Chief, Audit Staff. The technical expert will act as an adviser to the auditors. Accordingly, his views and opinions of course cannot be imposed on the auditors and the auditors have the right to deliberate independently.

- 12. In addition, the Deputy Director concerned may appoint a person from his staff--not from the component being audited/inspected--to assist the audit team as necessary, and whose relationship will be subject to the same guidelines as the technical expert.
- 13. Other possibilities include that of having the Inspection Staff conduct surveys or inspections in conjunction with the auditors, by assigning an inspector to the more important audits. In these cases, the audit teams and the inspector would work together in a Headquarters component, or at a field installation or on a program review/audit. Alternatively, auditors may be assigned to inspection teams, especially where financial considerations are important. These combinations of auditors and inspectors should be able to respond to the somewhat overlapping requirements of both audits and inspections. Over the coming months it is expected that these and other proposals will be tested out, refined, and improved.
- 14 The above is intended to be a discussion of the auditors role and the relationship between Audit and Inspection Staffs but in no way modifies or alters existing relevant regulations.

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Attachment:

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